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# Before The POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE OCHMISSION OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

# RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS HARAHUSH TO MPA INTERROGATORY (MPA/USPS-T12-7)

The United States Postal Service hereby provides the response of witness

Harahush to the following interrogatory of the Magazine Publishers of America:

MPA/USPS-T12-7, filed on February 18, 2000. This interrogatory was redirected from witness Baron.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

**UNITED STATES POSTAL SERVICE** 

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Plaza West, S.W. (202) 268-2993; Fax: -5402 Washington, D.C. 20260-1137 March 3, 2000

## RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARAHUSH TO INTERROGATORY OF THE MAGAZINE PUBLISHERS OF AMERICA REDIRECTED FROM WITNESS BARON

**MPA/USPS-T12-7.** Please confirm that ALDRAN.HQ059T01.CITY.PQ4FY97 contains a listing of all city carrier routes in the USPS system as the end of PQ 4 1997. If this is incorrect, please explain what the file does contain.

#### **RESPONSE:**

No. The file ALDRAN.HQ059T01.CITY.PQ4FY97 was created about six weeks before the end of PQ 4. It contains all city carrier letter routes in the USPS system at the time the file was created. It also includes some phantom routes, PO Boxes, uniques (a five digit ZIP Code for one customer), and military routes. It excludes parcel post routes, collection routes, and relay routes.

### **DECLARATION**

I, Thomas W. Harahush, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

<u>/ Imm as W. / Augstur</u> Thomas W. Harahush

Date: March 2 2000

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 March 3, 2000